



MURIEL GOODE-TRUFANT  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

April 30, 2025

**Marina Moraru**  
Special Assistant Corporation Counsel  
Office: 212) 356-2456

**VIA ECF**

Hon. Ronnie Abrams  
Thurgood Marshall United States Courthouse  
40 Foley Sq.  
New York, New York 10007

Re: *A.K. v. New York City Public Schools*, 25-cv-684 (RA)(GWG)

Dear Judge Abrams:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 90-day stay of this action until July 31, 2025. Plaintiff consents to this request, and has agreed to provide the needed billing records (and a privilege log, if redacted for privilege) by May 2, 2025. (Defendant's deadline to respond to the Complaint is currently July 3, 2025). On March 25, 2025, the Court granted Defendant's first request for an extension. (ECF 8). We note that, while this is an IDEA fees-only case and liability appears not at issue, without the relevant billing, Defendant cannot begin its internal settlement review process, which includes review of the underlying administrative record together with the relevant billing records, and thereafter present a reasonable early offer of settlement. We have resolved recent similar IDEA fees-only cases brought by plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice or conferences. The parties are hopeful this matter will be resolved as well.

I also respectfully propose that, if a stay is granted, the parties be required to submit a joint status letter regarding settlement negotiations on or before July 31, 2025.

Thank you for considering these requests.

Respectfully submitted,  
/s/ Marina Moraru

Marina Moraru, Esq.  
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)

Application granted. Furthermore, Defendant's July 3, 2025 deadline to answer or respond to the complaint is adjourned to August 7, 2025.

SO ORDERED.

A handwritten signature in dark ink, appearing to be 'RA' followed by a long horizontal stroke, positioned above a solid horizontal line.

Hon. Ronnie Abrams  
May 1, 2025